

From: [Smith, Monica](#)
To: [Thompson, Steve](#); [Tates, Samuel](#)
Subject: revised statements on west and williams. - any comments????
Date: Tuesday, June 25, 2013 8:17:00 PM

I incorporated the comments I received from Carl, Ragan, Steve T and Sam T. Let me know if you have any additional comments. Monica

West Fertilizer , West, Texas
Risk Management Plan (RMP) Inspection & Enforcement Update June 25, 2013

The Region 6 RMP inspectors conducted a reconnaissance visit of the site within days of the explosion. It is our understanding that all records including the RMP, were in the facility which was destroyed by the explosion. Thus, the RMP/root cause inspection will be limited to interviews of the West Fertilizer management and employees. The RMP inspectors will conduct the root cause/after action inspection once CSB and OSHA have completed their on-site investigations and interviews. EPA Region 6 has coordinated with CSB and OSHA throughout their investigation. All parties have agreed to share their findings. EPA RMP inspectors will review the OSHA and CSB report findings to determine if there are any actionable violations under CAA 112 (r). OSHA, per a letter dated June 19, 2013, was planning to access the site on June 24.

Williams Olefins Explosion, Geismar, Louisiana
Risk Management Plan (RMP) Inspection & Enforcement Update June 25, 2013

The facility is subject to Risk Management Plan under Clean Air Act 112(r). The facility is also subject to EPCRA Tier II reporting requirements and must submit information to the state, local emergency planning committee and fire department.

EPA Region 6 deployed 2 RMP inspectors to the facility on Monday June 24, 2013, to conduct an RMP/root cause inspection of the facility to determine if the cause of the explosion was related to a failure of the risk



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management plan. Upon arrival the EPA inspectors were informed that CSB and OSHA are on site conducting interviews with critical facility individuals, the majority of whom will be interviewed by EPA staff. EPA Region 6 staff is coordinating with CSB and OSHA and will offer to share information.

On Tuesday, June 25, the EPA inspection team toured the facility and reviewed facility documents including the facility specific Process Hazards Analysis, as part of the inspection to gain a better understanding of the processes with particular attention to the process involved in the explosion. The EPA Region 6 team will continue with the RMP/root cause inspection Wednesday June 26, provided facility personnel responsible for the facility RMP are available (no longer involved in OSHA or CSB investigations). The inspectors will be evaluating equipment maintenance, operating procedures, employee training, and other elements of the program related to the incident. The duration of the inspection will last 4 days, with follow up as necessary. The duration of the inspection will be driven by the availability and cooperation of the facility personnel. If the EPA team is unable to complete the inspection this week, they will reschedule the inspection for a later date.

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